

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION

ADJUSTACAM LLC

v.

AMAZON.COM, INC.; ET AL.

NO. 6:10-cv-329-LED

JURY

**PLAINTIFF'S ANSWER TO CONN'S COUNTERCLAIMS**

Plaintiff AdjustaCam LLC ("AdjustaCam") answers the counterclaims (Dkt No. 181) of Defendant Conn's, Inc. ("Conn's"), by corresponding paragraph number, as follows:

1. Admitted as to subject matter jurisdiction over counterclaims. Denied as to merits of counterclaims. Denied that Conn's is entitled to any declaratory relief.
- 2-3. Admitted.
4. Admitted as to subject matter jurisdiction over counterclaims. Denied as to merits of counterclaims.
- 5-7. Admitted.
8. Admitted that AdjustaCam has sued Conn's as set forth in AdjustaCam's complaint, as amended. Admitted that Conn's purports to deny such infringement.
9. Denied.
10. Admitted as to subject matter jurisdiction over counterclaims. Denied as to merits of counterclaims. Denied that Conn's allegations of non-infringement have any merit.
11. Denied.
12. Admitted as to subject matter jurisdiction over counterclaims. Denied as to merits of counterclaims. Denied that Conn's allegations of invalidity have any merit.
13. To the extent necessary, AdjustaCam denies that Conn's is entitled to the relief requested in its prayer for relief. In addition, to the extent necessary, AdjustaCam generally

denies any allegation in the counterclaims not specifically admitted above, and AdjustaCam re-alleges infringement, validity and damages, and denies any allegations in the counterclaim adverse to same.

PRAYER FOR RELIEF

WHEREFORE, AdjustaCam respectfully requests that this Court enter judgment denying and dismissing Conn's counterclaims, and that the Court enter judgment in favor of AdjustaCam as requested in AdjustaCam's complaint, as amended or supplemented.

October 5, 2010

Respectfully submitted,

ADJUSTACAM LLC

By: /s/ John J. Edmonds

John J. Edmonds – LEAD COUNSEL

Texas Bar No. 789758

Michael J. Collins

Texas Bar No. 4614510

Erick Robinson

Texas Bar No. 24039142

COLLINS, EDMONDS & POGORZELSKI, PLLC

1616 S. Voss Road, Suite 125

Houston, Texas 77057

Telephone: (281) 501-3425

Facsimile: (832) 415-2535

jedmonds@cepiplaw.com

mcollins@cepiplaw.com

erobinson@cepiplaw.com

Andrew W. Spangler

Texas Bar No. 24041960

Spangler Law P.C.

208 N. Green Street, Suite 300

Longview, Texas 75601

(903) 753-9300

(903) 553-0403 (fax)

spangler@spanglerlawpc.com

ATTORNEYS FOR PLAINTIFF

ADJUSTACAM LLC

**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

October 5, 2010

/s/ John J. Edmonds

John J. Edmonds